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March 6, 2017

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Via CM/ECF

Honorable Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Phoenix Ancient Art, S.A. et al. v. J. Paul Getty Trust et al.*, No. 17-241

Your Honor:

I write on behalf of Defendants the J. Paul Getty Trust, the J. Paul Getty Museum, and Timothy Potts (together, the "Getty Defendants") to request a short postponement of the pre-motion conference on Defendant Arturo Russo's request for leave to file a motion to dismiss, currently scheduled for March 9, 2017. Defendant Russo joins in this request. Plaintiffs in this action have stated that they do not oppose the request for a postponement.

The Getty Defendants' response to the Complaint is currently due March 22, 2017. The Getty Defendants believe that they have grounds for a motion to dismiss and therefore plan to file their own pre-motion letter requesting leave to file such a motion. Though Plaintiffs do not concede that any such motion would be meritorious, the parties have agreed that the Getty Defendants will file their pre-motion letter on or before March 15, 2017. Accordingly, the parties respectfully request that the Court postpone the scheduled March 9, 2017 conference to a date on which the Court could hold a single pre-motion conference on all defendants' requests for leave to move to dismiss. All parties have indicated that they are available for such a

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conference on March 27 and 29, or on such date thereafter based upon the Court's availability so as to afford Plaintiffs an opportunity to respond to the Getty Defendants' letter and for the Court to review the parties' respective submissions.

Finally, Defendant Russo has asked us to include in this letter a request that his counsel be permitted to appear and participate in the conference by telephone, as Mr. Russo's counsel is located overseas.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew A. Macdonald" followed by a stylized "AOR" in the right margin.

Matthew A. Macdonald

MAM: Michael Shore, Esq., counsel for Plaintiffs; Yisroel Hiller, Esq. counsel for Defendant Arturo Russo